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July 14, 2017

VIA ECF

Honorable Ronald E. Ellis
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 11201

Re: Jonathan Harris v. City of New York, et al.,
15-CV-08456 (CM)(RLE)

Your Honor:

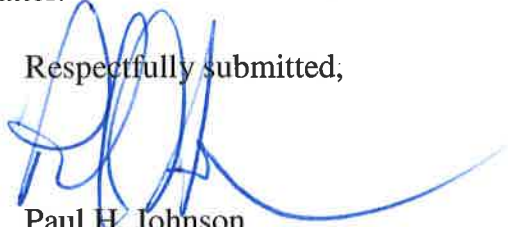
I am the Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to represent defendants in the above-referenced matter. At the Court Conference held on July 13, 2017 the Court ordered production of outstanding disciplinary files by July 14 at noon. After conferring with opposing counsel, defendants request an extension of time to produce those files until Monday July 17, 2017. Plaintiff's counsel Gabriel Harvis, Esq., does not consent to the requested enlargement.

Defendants have produced the photograph of one defendant officer in anticipation of his deposition today and disciplinary files regarding his case. But defense counsel does not have the time before noon and before defendant Detective Taylor's deposition to complete the Court request. Plaintiff has given us numbers of files they believe are outstanding, but defense counsel must figure out which officer the files refer to and then obtain the documents. Further defense counsel is seeking a protective order before the production of the remaining photographs and will request that order once plaintiff's counsel has agreed to and signed the order.

For the foregoing reasons, defendants respectfully request that the court enlarge the time to produce outstanding disciplinary files to Monday July 17, 2017. Thank you for your consideration regarding the within request.

Thank you for your consideration in this matter.

Respectfully submitted,



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